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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KIRSTIN BLAISE LOBATO,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; THOMAS THOWSEN,  
and JAMES LAROCHELLE,

Defendants.

Case Number:  
2:19-cv-01273-RFB-EJY

**STIPULATION AND ORDER TO EXTEND DEFENDANTS' REPLIES IN  
SUPPORT OF DEFENDANTS' MOTION FOR A NEW TRIAL AND MOTION FOR  
JUDGMENT AS A MATTER OF LAW [FIRST REQUEST]**

Plaintiff Kirstin Blaise Lobato, by and through her counsel of record, Rajan O. Dhungana, Esq., of the Federal Practice Group, and Elizabeth Wang, Esq., Megan Pierce, Esq. and David B. Owens, Esq. of the law firm of Loevy & Loevy, and Defendants Las Vegas Metropolitan Police Department, Thomas Thowsen and James Larochelle, by and through their counsel of record, Craig R. Anderson, Esq., Harry L. Arnold, Esq. and Andrew Yates, Esq., of the law firm of Marquis Aurbach, and hereby agree and jointly stipulate the following:

1. Defendants filed their Renewed Motion for Judgment as a Matter of Law on February 3, 2025 [ECF No. 214];

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2. Defendants filed their Motion for New Trial on February 3, 2025 [ECF No. 216];

3. Plaintiffs filed their Omnibus Response in Opposition to Defendants' Motion for a New Trial and Motion for Judgment as a Matter of Law on March 14, 2025 [ECF No. 234].

4. Pursuant to the Court's March 13, 2025 Minute Order, the deadline for Defendants' reply is currently April 1, 2025 [ECF No. 233];

5. Good cause to extend this deadline exists because counsel for LVMPD will be unable to meet the current deadline due to other case obligations. These have included and do include: for Mr. Anderson, six depositions on March 25, 2025 in *Pitcher v. LVMPD*, Case No. 2:24-cv-01482-APG-NJK, March 26, 2025 in *Correa v. Booth*, Case No. 2:24-cv-02409-JAD-NJK, March 28, 2025 in *Williams v. LVMPD*, Case No. 2:24-cv-00074-APG-NJK, March 31, 2025 in *Cheek v. LVMPD*, Case No. A-24-892265-C, and April 2, 2025 in *Ramirez v. LVMPD*, Case No. 2:24-cv-02238-MMD-DJA, a settlement conference on March 24, 2025 in *Sommer v. LVMPD*, Case No. 2:23-cv-01682-GMN-NJK, and an oral argument before the Ninth Circuit on April 9, 2025 in *The Estate of Paul Browning, et al. v. LVMPD, et al.*, originating Case No. 2:20-cv-01381-KJD-MDC; and for Mr. Yates, obligations to review, produce, object to, and meet and confer regarding a non-party subpoena in *McAllister, et al. v. Clark County*, Case No. 2:23-cv-00177-RFB-EJY (D. Nev.), review, redaction, and production of documents in response to a subpoena in *Williams v. Gathing*, Case No. 2:24-cv-01626-APG-BNW, a motion to dismiss and answer deadline on April 4, 2025 in *Carter v. LVMPD*, Case No. A-25-912483-C, and hearings on emergency motions for equitable relief, temporary restraining order, preliminary and permanent injunctions, and to bifurcate trial into liability and damages phases on April 8, 2025 in *Filutowski v. LVMPD*, Case No. A-25-913240-C;

6. The Parties have conferred and agreed to a fourteen-day extension for Defendants' Replies in Support of Defendants' Motion for a New Trial and Motion for Judgment as a Matter of Law;

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1 7. Accordingly, the Parties request that the deadline for Defendants' Replies in  
2 Support of Defendants' Motion for a New Trial and Motion for Judgment as a Matter of  
3 Law, currently due on April 1, 2025, be extended to and including Tuesday, April 15, 2025;

4 8. This is the Parties' first request to extend the deadline to Defendants'  
5 Omnibus Reply in Support of Defendants' Motion for a New Trial and Motion for Judgment  
6 as a Matter of Law; and

7 9. This Stipulation is being entered in good faith and not for purposes of delay.

8 IT IS SO STIPULATED.

9 DATED this 27th day of March, 2025

DATED this 27th day of March, 2025

MARQUIS AURBACH

11 By: /s/ David B. Owens

12 Rajan O. Dhungana, Esq.  
13 Nevada Bar No. 13102  
14 FEDERAL PRACTICE GROUP  
15 *Designated Resident Nevada Counsel*  
16 *for Plaintiff*

17 Elizabeth Wang, Esq.  
18 (admitted pro hac vice)  
19 LOEVY & LOEVY

20 Megan Pierce, Esq.  
21 (admitted pro hac vice)  
22 LOEVY & LOEVY

23 David B. Owens, Esq.  
24 (admitted pro hac vice)  
25 LOEVY & LOEVY  
26 c/o Civil Rights and Justice Clinic  
27 Attorneys for Plaintiff

By: /s/ Andrew Yates

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Attorneys for Defendants LVMPD,  
James LaRochelle and Thomas  
Thowsen

**ORDER**

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT JUDGE

DATED: March 27, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEFENDANTS' REPLIES IN SUPPORT OF DEFENDANTS' MOTION FOR A NEW TRIAL AND MOTION FOR JUDGMENT AS A MATTER OF LAW [FIRST REQUEST]** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 27th day of March, 2025.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☒ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch  
An employee of Marquis Aurbach

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